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21 UNITED STATES DISTRICT COURT

22 NORTHERN DISTRICT OF CALIFORNIA

23 SAN FRANCISCO DIVISION

24 UNITED STATES OF AMERICA,) CASE NO. 3:20-MJ-70483

25 Plaintiff,) STIPULATION TO CONTINUE
v.) HEARING AND FOR EXCLUSION
26 RODNEY L. STEVENSON II,) OF TIME PURSUANT TO THE
Defendant.) SPEEDY TRIAL ACT AND F.R.C.P.
27) 5.1(d)

28 The United States of America, represented by Colin Sampson, and defendant Rodney L.

29 Stevenson II, represented by Ryan D'Ambrosio and Jeremy Ross, hereby STIPULATE and AGREE as
30 follows:

31 The Complaint against defendant was filed in the Northern District of California on April 24,
32 2020, and unsealed after defendant's arrest on April 28, 2020. ECF Nos. 1, 3. Defendant was arraigned
33 in the Western District of Michigan on April 28, 2020, and was ordered to appear before the United

1 States District Court for the Northern District of California on July 16, 2020. Defendant has waived
2 time between April 28, 2020 and September 3, 2020, pursuant to Federal Rule of Criminal Procedure
3 5.1(d) and 18 U.S.C. §§ 3161(b), (h)(7)(A) and (h)(7)(B)(iv). Since July 9, 2020, pursuant to a
4 protective order (ECF No. 9), the United States has produced approximately 10,000 pages of discovery.

5 The parties have recently met and conferred regarding discovery. Given the need to review
6 discovery and adequately prepare for any preliminary hearing or other proceeding, the parties jointly
7 request and move the Court to continue the Preliminary Hearing from Thursday, September 3, 2020, to
8 Wednesday, October 21, 2020.

9 Respectfully submitted,

10 DAVID L. ANDERSON
United States Attorney

11 Dated: September 1, 2020.

12 */s/ Colin Sampson*
COLIN SAMPSON
Assistant United States Attorneys

13 *Attorneys for the United States of America*

14 Dated: September 1, 2020.

15 */s/ Ryan D'Ambrosio*
RYAN D'AMBROSIO
JEREMY ROSS
D'Ambrosio Ross LLP

16 *Attorneys for Defendant Rodney L. Stevenson II*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. 3:20-MJ-70483
Plaintiff,)
v.) **[PROPOSED] ORDER EXCLUDING
RODNEY L. STEVENSON II,) TIME PURSUANT TO THE SPEEDY
Defendant.) TRIAL ACT AND F.R.C.P. 5.1(d)**

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Pursuant to the consent and stipulation of defendant Rodney L. Stevenson, II and his counsel,
and The United States of America and its counsel, and for good cause shown,

IT IS ORDERED THAT the status conference and preliminary hearing scheduled for September
3, 2020, is continued to October 21, 2020, at 11:00 a.m. It is further

ORDERED THAT time under the Speedy Trial Act and Federal Rule of Criminal Procedure 5.1
as to Rodney L. Stevenson II is excluded from the date of this Order until October 21, 2020, pursuant to
18 U.S.C. §§ 3161(b), (h)(7)(A) and (B)(iv) and Federal Rule of Criminal Procedure 5.1(d), at the
consent of the defendant and for continuity of defense counsel and effective preparation, taking into
account the exercise of due diligence. It is further

ORDERED THAT defendant has consented to and may appear at the hearing currently
scheduled for October 21, 2020, by video teleconference.

IT IS SO ORDERED.

Dated: September 1, 2020


THE HONORABLE ~~NATHANAEL M. COUSINS~~
UNITED STATES MAGISTRATE JUDGE
VIRGINIA K. DEMARCHE